

# **EXHIBIT A**

Ann M. Merritt, Esq.  
Attorney I.D. No.: 028551999  
TOBIN, KESSLER, GREENSTEIN,  
CARUSO, WIENER & KONRAY  
A Professional Corporation  
136 Central Avenue  
Clark, New Jersey 07066  
732-388-5454  
Attorneys for Plaintiff  
Our File No: 243189

|   |  |
|---|--|
| MARIA I. RODRIGUEZ,<br><br>Plaintiff,<br><br>vs.<br><br>SHAWN F. PENNELL, CARRIGAN &<br>SONS TRUCKING, JOHN DOE #1-10,<br>JANE ROE #1-10 and ABC COMPANY<br>#1-10, said names being<br>fictitious,<br><br>Defendants. | SUPERIOR COURT OF NEW JERSEY<br>LAW DIVISION: HUDSON COUNTY<br><br>Docket No.: HUD-L-3120-17<br><br><u>CIVIL ACTION</u><br><br>SUMMONS |
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From the State of New Jersey, to:

**CARRIGAN & SONS TRUCKING**

The Plaintiff(s), named above, have filed a lawsuit against you in the Superior Court of New Jersey. The complaint attached to this summons states the basis for this lawsuit. If you dispute this complaint, you or your attorney must file a written answer or motion and proof of service with the deputy clerk of the Superior Court in the county listed above within 35 days from the date you received this summons, not counting the date you received it. A directory of the addresses of each deputy clerk of the Superior Court is available in the Civil Division Management Office in the county listed above and online at [http://www.judiciary.state.nj.us/pro se/10153 deptyclerklawref.p](http://www.judiciary.state.nj.us/pro se/10153 deptyclerklawref.pdf) df. If the complaint is one in foreclosure, then you must file your written answer or motion and proof of service with the Clerk of the Superior Court, Hughes Justice Complex, CN-971, Trenton, NJ 08625. A \$175.00 filing fee payable to the Clerk of the Superior Court and a completed Case Information Statement (available from the deputy clerk of the Superior Court) must

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ALEXANDER COUNTY  
SHERIFF'S OFFICE

accompany your answer or motion when it is filed. You must also send a copy of your answer or motion to Plaintiff's attorney whose name and address appear above, or to Plaintiff(s), if no attorney is named above. A telephone call will not protect your rights; you must file and serve a written answer or motion (with fee of \$175.00 and completed Case Information Statement) if you want the court to hear your defense.

If you do not file and serve a written answer or motion within 35 days, the court may enter a judgment against you for the relief Plaintiff's demand, plus interest and costs of suit. If judgment is entered against you, the Sheriff may seize your money, wages or property to pay all or part of the judgment.

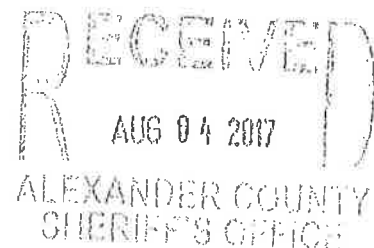
If you cannot afford an attorney, you may call the Legal Services office in the county where you live or the Legal Services of New Jersey Statewide Hotline at 1-888-LSNJ-LAW (1-888-576-5529). If you do not have an attorney and are not eligible for free legal assistance, you may obtain a referral to an attorney by calling one of the Lawyer Referral Services. A directory with contact information for local Legal Services Offices and Lawyer Referral Services is available in the Civil Division Management Office in the county listed above and online at [http://www.judiciary.state.nj.us/prose/10153\\_deptyclerklawref.pdf](http://www.judiciary.state.nj.us/prose/10153_deptyclerklawref.pdf).

/s/ Michelle M. Smith, Esq., Clerk  
MICHELLE M. SMITH, ESQ., CLERK

Date: July 28, 2017

**ADDRESS FOR SERVICE:**

Carrigan & Sons Trucking  
5587 NC Highway 16 S  
Taylorsville, NC 28681



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Ann M. Merritt, Attorney ID#: 028551999  
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WIENER & KONRAY  
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(732)-388-5454  
Attorneys for Plaintiff

MARIA I. RODRIGUEZ,  
  
Plaintiff,

SUPERIOR COURT OF NEW JERSEY  
LAW DIVISION: HUDSON COUNTY

Docket No.:

vs.

CIVIL ACTION

SHAWN F. PENNELL, CARRIGAN &  
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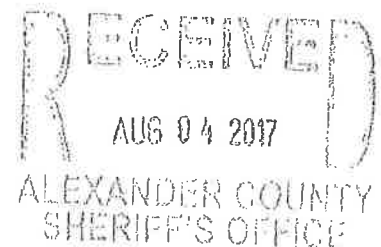
COMPLAINT, JURY DEMAND  
DESIGNATION OF TRIAL COUNSEL  
DEMAND FOR PRODUCTION OF  
DOCUMENTS DEMAND FOR ANSWERS  
TO INTERROGATORIES

Defendants,

Plaintiff, Maria I. Rodriguez residing at 2615 Kennedy Boulevard,  
in the Township of North Bergen, County of Hudson and State of New  
Jersey, by way of Complaint against the Defendants, says:

FIRST COUNT

1. On or about the 25th day of January 2016, Plaintiff, Maria I. Rodriguez was a lawful pedestrian standing at the corner of 30<sup>th</sup> Street at its intersection with Kennedy Boulevard in the Township of North Bergen, County of Hudson, and State of New Jersey, when she was struck by a vehicle owned by Defendant, Carrigan & Sons Trucking and operated in a negligent manner by their agent, servant and/or employee, Defendant, Shawn F. Pennel.



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2. As a direct and proximate result of the negligence of the Defendants aforesaid, Plaintiff suffered serious physical and emotional injuries of both a temporary and permanent nature, considerable pain, anguish and suffering, shock, loss of wages and other special damages.

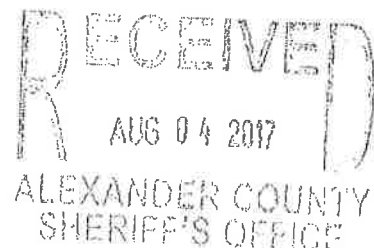
WHEREFORE, Plaintiff demands judgment jointly, severally or in the alternative against all Defendants on this count for damages, interest and costs.

SECOND COUNT

1. Plaintiff, Maria I. Rodriguez repeats the allegations contained in the First Count of this Complaint and make it a part hereof.

2. The Defendants, John Doe #1-10, Jane Roe #1-10, ABC Company #1-10, are fictitious names intended to identify any and all parties, including individuals, corporations and/or other entities whose identities are presently unknown to the Plaintiff, who together with the named Defendants were responsible for the ownership, operation, control, maintenance and leasing of the vehicles involved in the collision referred to herein or who in anyway caused or contributed to Plaintiff's injuries.

3. As a direct and proximate result of the negligence of the Defendants aforesaid, Plaintiff suffered serious physical and emotional injuries of both a temporary and permanent nature, considerable pain, anguish and suffering, shock, loss of wages and other special damages.



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WHEREFORE, Plaintiff demands judgment jointly, severally or in the alternative against all Defendants on this count for damages, interest and costs.

JURY DEMAND

Plaintiff demands a trial by jury on all Counts in this Complaint.

TOBIN, KESSLER, GREENSTEIN,  
CARUSO, WIENER & KONRAY, P.C.  
ATTORNEYS FOR PLAINTIFF

DATE: July 28, 2017


  
BY: ANN M. MERRITT

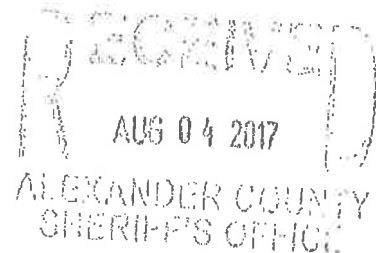
DESIGNATION OF TRIAL COUNSEL

Pursuant to Rule 4:25-4, Ann M. Merritt is hereby designated trial counsel in the above captioned matter for the Law firm of Tobin, Kessler, Greenstein, Caruso, Wiener & Konray, P.C., Attorneys for the Plaintiff, Maria I. Rodriguez.

TOBIN, KESSLER, GREENSTEIN,  
CARUSO, WIENER & KONRAY, P.C.  
ATTORNEYS FOR PLAINTIFF

DATE: July 28, 2017

  
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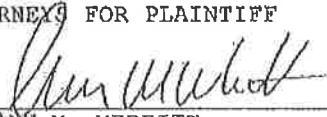
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DEMAND FOR ANSWERS TO INTERROGATORIES

Demand is hereby made on the Defendants to answer fully and responsively Form C Uniform and Form C(1) Uniform Interrogatories, personal injury, Superior Court found in Appendix II as provided by R. 4:17-(b)(ii) and the other applicable Rules of Court.

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CARUSO, WIENER & KONRAY, P.C.  
ATTORNEYS FOR PLAINTIFF

DATE: July 28, 2017

  
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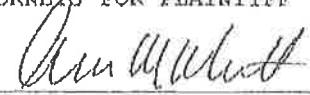
RULE 4:5-1 CERTIFICATION

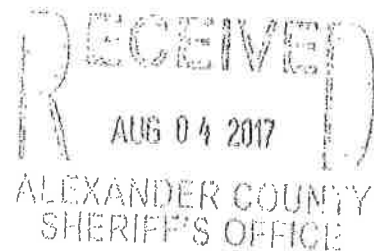
Pursuant to Rule 4:5-1 the undersigned hereby certifies that at the time of filing this Complaint, the matter in controversy is not the subject of any other action pending in any Court and/or Arbitration proceeding.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are wilfully false, I am subject to punishment.

TOBIN, KESSLER, GREENSTEIN,  
CARUSO, WIENER & KONRAY, P.C.  
ATTORNEYS FOR PLAINTIFF

DATE: July 28, 2017

  
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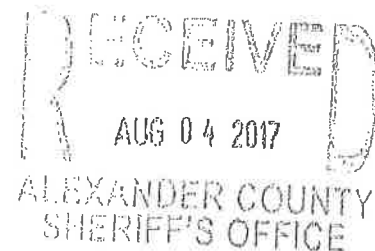
DEMAND FOR PRODUCTION OF DOCUMENTS

Pursuant to Rule 4:18-1, the Plaintiff hereby demands that the Defendants produce the following documentation within thirty (30) days as prescribed by the Rules of Court. Additionally, please be advised that the following requests are ongoing and continuing in nature and the Defendants are therefore required to continuously update their responses thereto as new information or documentation comes into existence.

1. The amounts of any and all insurance coverage covering the defendants, including but not limited to, primary insurance policies, secondary insurance policies and/or umbrella insurance policies. For each such policy of insurance, supply a copy of the declaration page therefrom.

2. Copies of any and all documentation or reports, including but not limited to, police reports, accident reports and/or incident reports concerning the happening of the incident in question or any subsequent investigation of same.

3. Copies or duplicates of any and all photographs, motion pictures, videotapes, films, drawings, diagrams, sketches or other reproductions, descriptions or accounts concerning the individuals involved in the incident in question, the property damage sustained, the accident scene, or anything else relevant to the incident in question.



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4. Copies of any and all signed or unsigned statements, documents, communications, and/or transmissions, whether in writing, made orally or otherwise recorded by any mechanical or electronic means, made by any party to this action, any witness, or any other individual, businesses, corporation, investigative authority or other entity concerning anything relevant to the incident in question.

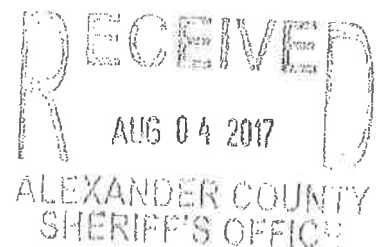
5. Copies of any and all documentation, including but not limited to, safety manuals, statutes, rules, regulations, books, and/or industry standards which refer to, reflect or otherwise relate to the incident in question or any potential defense to the action in question.

6. Copies of any and all discovery received from any other parties to the action in question.

7. Copies of any and all reports on the plaintiff received by the defendant, or any other party to this suit, from either the Central Index Bureau (C.I.B.) or from any other source.

8. Copies of any and all medical information and/or documentation concerning the plaintiff in this matter whether it concerns medical condition or treatment which took place before, during or after the time of the incident in question.

9. Copies of any and all records of any type subpoenaed by the defendants or received from any other source concerning the plaintiff or the incident in question.



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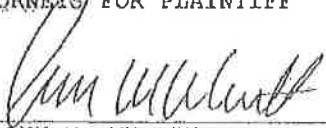
10. Please be advised that the plaintiff hereby objects to the taking of any photographs, x-rays or other reproductions concerning the plaintiff or the plaintiff's injuries at the time of the defense examination.

11. Copies of all cellular phone bills of any and all phones that each defendant had access to on the date of the subject accident.

12. Copy of the entire Property Damage file maintained by each defendant, their insurance companies and their respective including but not limited to photos and repair estimates for all vehicles involved in the subject accident.

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CARUSO, WIENER & KONRAY, P.C.  
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DATE: July 28, 2017

  
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